



EUROPEAN ALLIANCE TO
SAVE ENERGY
Creating an Energy-Efficient Europe

To: Mr **Konrad MIZZI**
Maltese Minister for Energy and Health
Maltese Presidency of the Council of the EU

Cc: EU28 Energy Ministers

Monica Frassoni
President of the European Alliance to Save Energy (EU-ASE)
Square de Meeus, 22 A
1050 Brussels (Belgium)

Brussels, 10 May 2017

Dear Minister,

Re: European Alliance to Save Energy views on the current revisions of the Energy Efficiency and Energy Performance of Building Directives (EED and EPBD).

I am writing to you on behalf of the European Alliance to Save Energy (EU-ASE). EU-ASE is a multi-sectoral business organisation whose members have operations across the 28 Member States of the European Union, employ 340.000 people in Europe and have an aggregated annual turnover of €115 bn.

Considering the strategic relevance of the ongoing discussions on energy efficiency in the Council and the forthcoming Informal Energy Council (May 18-19), we would like to provide you with our views on the current revisions of the Energy Efficiency and Energy Performance of Building Directives (EED and EPBD).

Energy efficiency is the most cost-effective way to support the EU's energy transition:

- Energy Efficiency produces not only financial savings but also potential economic gains and represents a clear business opportunity with a high return on investment.
- In addition, it provides consumers with tangible benefits through reduced energy bills, generation of local jobs, improved air quality and comfort, strengthened energy security and higher economic productivity.

With these aspects in mind, **we call for an ambitious revision of EED and EPBD in order to provide the business and financial community with a long-term regulatory framework and clear market signals for investments.**

We would like to respectfully **express our concern in relation to the current discussions taking place in the Council**, and we hope you will take the necessary time to assess the implications of some of the changes proposed.

With regards to the EED:

- We urge you to **keep the binding nature of the EU energy efficiency target and increase the level of ambition towards 40%**. Far from imposing a burden on our economies, keeping the binding nature of the target is essential to create the needed certainty for investors and a common sense of direction enabling consistent investments and progress toward milestones. A 40% binding target for energy efficiency also represents the minimum effort required for the EU to remain on track with its commitment to the Paris Agreement.
- Furthermore, we would welcome **greater ambition concerning art.7 of the EED**. We support the need to keep an adequate level of flexibility for Members States, but we would like you to carefully consider the risks of not addressing existing loopholes and exemptions that, so far, have practically halved the annual cumulative energy savings that should have been delivered by the 1.5% national saving obligation target set by art. 7. According to recent calculations based on the Impact assessment of the Commission, keeping the 1,5% national saving obligation rate and removing loopholes and exemptions would save households 706€ per year and would reduce gas imports by 18,3%.
- We also believe that it is essential to **remove the sunset clause in art. 7**, to give long term certainty to investments in the energy efficiency market.

With regard to the EPBD:

- We would like to express our **concerns on the consistent weakening of the Commission proposal** presented in the latest compromise text of the Maltese Presidency. We would like to reiterate that increasing the rate, depth and quality of building renovations is one of the biggest challenges for the coming decades. The revision of the EPBD provides us with a **unique opportunity to put existing buildings at the centre of the EU's energy transition** and to address EU and national key priorities such as job creation, economic growth, improved health and energy security.
- In light of this perspective, we urge you to consider the strategic importance of **setting a clear and coherent EU 2050 pathway towards a highly efficient and decarbonized building stock**. Only such a reliable long term common vision will set the right framework for designing impactful national **long-term renovation strategies that will boost private investments** and will incentivize financing models, such as energy performance contracting, which can reduce the need of public financial support in building renovations.
- Long-term renovation strategies should include milestones for 2030 and 2040, in order to open up markets for energy efficient technologies and solutions ranging from services enabling enhanced management of buildings to insulation—and from heating and ventilation systems to lighting and control systems. With regards to the latter, it is essential to secure **meaningful improvements of the technical building systems, leveraging the potential of building automation and controls** for optimised energy performance.

Dear Minister, we are putting our trust in your political vision, and we hope that this important legislative process can lead to a clearer and more impactful regulatory framework tailored to preserve the EU-industry competitive advantage in the fast-growing and innovative field of energy efficiency.

Further details on our positions concerning the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD) are included in the Position Papers [enclosed](#) to this letter.

Yours sincerely,



Monica Frassoni
President
European Alliance to Save Energy

Members



Honorary Members

Bendt Bendtsen
MEP, Denmark, EPP

Bas Eickhout
MEP, Netherland, Greens

Morten Helveg Petersen
MEP, Denmark, ALDE

Peter Liese
MEP, Germany, EPP

Kathleen Van Brempt
MEP, Belgium, S&D

About the European Alliance to Save Energy (EU-ASE)

EU-ASE was established in December 2010 by some of Europe's leading multinational companies. The Alliance creates a platform from which our companies (1E, Danfoss, Ingersoll Rand, Kingspan, Knauf Insulation, Oracle Utilities, Philips Lighting, Schneider Electric, Saint-Gobain, Siemens and Veolia) can join with politicians and thought leaders to ensure the voice of energy efficiency is heard from across the business and political community. EU-ASE members have operations across the 28 Member States of the European Union, employ over 340.000 people in Europe and have an aggregated annual turnover of €115 billion.